

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**RAINI REID GILMORE,**  
Plaintiff,

v.

Case No. 11-12641  
Honorable Patrick J. Duggan  
Magistrate Judge R. Steven Whalen

**ITC HOLDINGS CORP.,**  
a Michigan corporation,  
Defendant.

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**STIPULATED PROTECTIVE ORDER**

Pursuant to the stipulation of the parties, **IT IS ORDERED** that:

1. This Order shall apply to all confidential employee and company information and documents, including personnel information of current and former employees of Defendant, produced by Defendant, ITC Holdings Corp., in response to Plaintiff's Interrogatories and Document Requests in the above-referenced matter.

2. Information and documents subject to this Protective Order shall only be used in conjunction with the above-captioned case and shall only be disclosed by Plaintiff as follows:

- (a) to counsel of record for Plaintiff including his office and clerical staff working on this case;
- (b) to expert witnesses or consultants engaged by Plaintiff or on Plaintiff's behalf to assist in the prosecution of the action;
- (c) to the Court and Court personnel subject to such safeguards as the Court may deem necessary; and
- (d) to non-party witnesses and their counsel only to the extent disclosure is necessary for their testimony.

3. Plaintiff and all persons to whom information and/or documents subject to this Protective Order are disclosed are authorized only to use such information and documents in

connection with this action and are precluded from disclosing the information or documents to any other person except as specifically provided herein. No person receiving or reviewing such information shall disclose it or its content to any person other than those authorized by this Order and for the purposes specified in this Order.

4. At the conclusion of this litigation, Plaintiff and her counsel shall return to counsel for Defendant all documents and items which are supplied subject to this Order, as well as any copies, notes, deposition transcripts, or records of information supplied by Defendant subject to this Order, including copies supplied to experts, consultants, or witnesses.

5. The provisions of this Order shall survive and remain in force and effect after the conclusion of this litigation whether the conclusion be by settlement or by litigation. The Court retains jurisdiction to construe and enforce the provisions of this Order.

**IT IS SO ORDERED.**

s/Patrick J. Duggan  
Patrick J. Duggan  
United States District Judge

Dated: October 18, 2011

I hereby certify that a copy of the foregoing document was served upon counsel of record on Tuesday, October 18, 2011, by electronic and or ordinary mail.

s/Marilyn Orem  
Case Manager

Stipulated as to form and substance:

s/ Jeffrey S. Burg  
Jeffrey S. Burg (P38381)  
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